

Via ECF

April 5, 2024

Hon. Lorna G. Schofield  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:    *The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.*,  
      Case No. 16-civ-8778-LGS [rel. 1:12-cv-03040-KBF]**

Dear Judge Schofield:

Pursuant to the Court's October 12, 2022 Order (ECF 469) ("Stay Order"), we write on behalf of The Travelers Indemnity Company and The Travelers Indemnity Company of Connecticut ("Travelers"), Century Indemnity Company ("Century"), and Northrop Grumman Corporation and Northrop Grumman Systems Corporation ("NG") (collectively, "the Parties"), to provide an update regarding the status of the underlying *Romano* lawsuit. This is the twelfth status letter in response to the Stay Order.

Consistent with the Parties' statements in their November 25, 2022 letter (ECF 472), the below is NG's status summary of the *Romano* lawsuit:

1. As noted in the July 10, 2023 status letter (ECF 480), the parties completed briefing the *Romano* plaintiffs' class certification motion and the parties' *Daubert* motions related to class certification experts. The completed briefing papers were filed with the court on June 7, 2023.
2. As noted in the February 20, 2024 status letter (ECF 487), in January 2024 the parties agreed to enter into mediation. In light of the anticipated mediation, the court removed the pending motions from the docket while mediation proceeds, stated it would promptly rule on the pending motions should mediation not succeed, and directed the parties to file a letter to restore the pending motions for rulings if mediation is unsuccessful. The court also scheduled a status conference for May 24, 2024.
3. On March 1, 2024, the parties jointly requested that the court appoint David Geronemus, Esq. as the court-appointed neutral. On the same day, the court issued an order granting the parties' request.
4. Until the mediation concludes, we expect few, if any, developments in the *Romano* litigation.
5. As previously noted, the *Romano* court did not establish any deadlines for any proceedings after the completion of class certification briefing. Thus, there are no existing case deadlines at this time.

In accordance with the Stay Order, the Parties will file the next status letter regarding the *Romano* litigation on or before May 20, 2024.

Respectfully submitted,

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